

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 2017-CV-210-MJW

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,
LEONARD S. LABRIOLA

Plaintiffs,

v.

KNIGHTS OF COLUMBUS,
THOMAS P. SMITH, JR.
MATTHEW A. ST. JOHN,

Defendants.

AFFIDAVIT OF [REDACTED]

I, [REDACTED], being duly sworn do declare under oath:

1. I am a former Field Agent with the Knights of Columbus.
2. The Knights of Columbus Supreme Council ("Supreme"), and its Chief Insurance Officer Tom Smith, are widely known to retaliate against members and agents if they believe they have betrayed them and refused to obey their directives. I am aware of several current agents of the Knights of Columbus that would like to speak up about the Knights' illegal or unethical behavior, but have not done so out of fear of retaliation.
3. I am aware that, within the Knights of Columbus as a whole, there is a widespread fear of retaliation from Supreme.
4. Furthermore, within the Knights of Columbus, there is an expectation of absolute obedience to superiors.
5. I have read the email sent by Supreme on 2/10/17 at 3:19 p.m. With my experience working with the Knights of Columbus and my understanding of their corporate culture, I understand that email to be an instruction to not cooperate with or testify on behalf of UKnight in this case.

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I, [REDACTED], declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



Subscribed and affirmed before me by [REDACTED] this 14th day of February 2017.

A handwritten signature in dark ink, appearing to read "Terace Harper", written over a horizontal line.
Witness

Terace Harper